IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Larry Washington *Plaintiff,* vs. Marion Tuthill, Warden, *et al*. *Defendants*.	Civil Action No. GLR-13-03767

JOINT MOTION TO STAY PROCEEDINGS AND NOTICE OF PENDING SETTLEMENT

Pursuant to Fed. R. Civ. P. 7, plaintiff Larry Washington, through his counsel, Brett Ingerman and David Dyson, DLA Piper, LLP, and defendants Marion Tuthill, Shavella Miles, Captain Karen Moore, Lt. Anika Beverly, Sergeant Michael Porter, and Correctional Officer Andrene Ffolkes, through their attorneys, Brian E. Frosh, Attorney General of Maryland, Laura Mullally, Assistant Attorney General, and Merrilyn Ratliff, Assistant Attorney General, hereby file this Joint Motion To Stay Proceedings And Notice Of Pending Settlement.

The parties respectfully request a stay of proceedings in this case, with all deadlines, pending motions, and hearings tolled so that the necessary approval can be obtained from the Maryland Board of Public Works. In further support of this request, the parties state:

1. Both sides have reached an agreement in principle to settle this matter.

2. A settlement agreement by the defendants requires the approval of the Maryland Board of Public Works (the "Board").

3. Proposals to the Board typically take four to six weeks to get onto the Board's agenda. Defense counsel may not be able to get the topic on the Board's agenda until the meeting on March 22, 2017.

4. Several deadlines and a hearing are scheduled to occur before approval by the Board can be obtained.

WHEREFORE, for the reasons set forth above, the parties respectfully request that this Court grant the foregoing Joint Motion To Stay Proceedings And Notice Of Pending Settlement.

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